



## FACTSHEET

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## THE ASFPM GUIDE TO SELF-STUDY CECs

With more of our colleagues quarantined in their homes and unable to travel due to COVID-19, we know this puts our nation's CFMs in a predicament, especially those with July and January renewal dates. Many of our Chapters are also having to make that difficult decision to cancel chapter conferences.

At ASFPM, we have solutions! We hope you will use the following guide to help you get your required CECs, as well as increase your professional development during your quarantine. Access your current CECs on record with us on your [CFM portal](#).

### FEMA-EMI, ISP Courses No cost

Through our partnership with the Emergency Management Institute—FEMA's training center—we have approved 102 self-study courses for CEC credit at no cost. However, you must complete the final exam to receive your certificate for the course that you will turn in for CEC credit. If you go directly to the EMI site, please note that 0.1 CEU equals 1 CEC.

Access the [pre-approved list](#) on our website.

Access these courses on the [EMI website](#).

### COMET – Independent Study Courses No cost

COMET is made possible through sponsorship from NOAA, the World Meteorological Organization, U.S. Department of the Interior, and USACE just to name a few. We have approved 39 courses for CEC credit. You must complete the course and the quiz(es) in order to receive your certificate that is turned in for CEC credit. The links to each course can be on the [ASFPM website](#).

### Inside this issue:

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# THE ASFPM GUIDE TO SELF-STUDY CECs



## ASFPM Online University ([RedVector.com](https://floods.redvector.com/))

Costs vary

Red Vector hosts courses created by our colleagues and other ASFPM partners. It is a paid class platform. However, registering through the ASFPM Online University grants you a 15% discount off of the main website, as well as supports a small royalty back to the course creator and to ASFPM to continue to support training objectives. The ASFPM Certification Board of Regents has recently added over 150 more courses to the curated list, which can be found by looking up “ASFPM” in the search tab and scrolling under #3. Feel free to contact [training@floods.org](mailto:training@floods.org) for assistance during normal business hours. Access courses via the ASFPM Online University at: <https://floods.redvector.com/>

## ASFPM Webinars and partner webinars

Cost varies from no cost to various depending on membership.

ASFPM hosts an average of two to four webinars per month. ASFPM members, Chapter members (sent to Chapter officers for distribution) and partners automatically get invitations to the ASFPM Webinar series as well as the ASFPM/APA PIE webinar series. ASFPM special edition, lunch-n-learn, and CTP information exchange invitations generally go to ASFPM members that have selected to be on that committee’s email list during their ASFPM membership renewal or by self-selecting on their member portal (if you would like access to these webinars, become a member of ASFPM by [clicking here](#)).

We currently have five different webinar series:

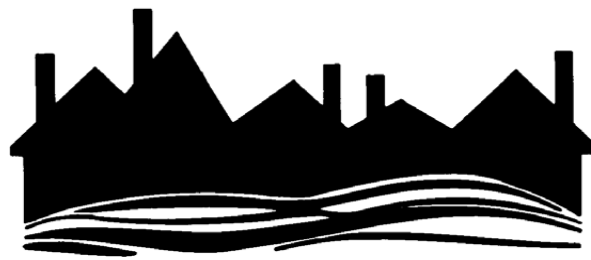
1. **ASFPM Webinar series** – For fee webinars on cutting edge issues by subject matter experts.
2. **ASFPM Special Edition webinars** – No cost, special topic webinars for members put on by any of the 14 ASFPM policy committees.
3. **ASFPM Lunch-n-Learn webinars** – No cost, special topic webinars for members put on by any of the 14 ASFPM policy committees.
4. **ASFPM Cooperating Technical Partners “CTP Information Exchange”** – No cost, special topic webinars put on by ASFPM’s Flood Science Center in partnership with the Mapping and Engineering Standards Committee.
5. **ASFPM/APA Planning Information Exchange “PIE webinars”**– No cost, special topic webinars alternating between APA-led (American Planning Association) and ASFPM-led.

We hope this list helps you in your search for safe online CECs. We are all in this together, and we thank you for being part of our ASFPM community.

Your partners at ASFPM and the Certification Board of Regents. ≡ ≡ ≡

*(Taken from an email from ASFPM, March 2020)*





## NFIP/ CRS Corner



# The 2021 Addendum to the 2017 CRS Coordinator's Manual

In the last NFIP/CRS Update newsletter, the CRS announced that the Federal Emergency Management Agency (FEMA) plans to issue a 2021 Addendum to the 2017 CRS Coordinator's Manual, to be effective January 2021. The Addendum will be used by communities in conjunction with the current Coordinator's Manual. The Addendum will serve as a "bridge" between the existing guidance materials and the more comprehensive update that is anticipated to be needed as FEMA implements updates and changes to the National Flood Insurance Program (NFIP).

The 2021 Addendum will include two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. The 2021 Addendum is not expected to be a large document. Below is a summary of its planned content. More information and guidance will be provided for the new credit opportunities in the coming months.

### CRS Prerequisites

The **Class 9 prerequisite** for FEMA Elevation Certificates will be changed to require 90% accuracy at a community's annual review, plus a requirement for a community to have written Elevation Certificate management procedures (element ECMP). All communities will receive 38 points under Activity 310 (Elevation Certificates) for ECPM. Credit for element Elevation Certificates under Activity 310 will be retired.

A **new Class 8 prerequisite** will require communities to adopt and enforce at least a 1-foot freeboard requirement (including equipment or mechanical items) for all residential buildings constructed, substantially improved, and/or reconstructed due to substantial damage, throughout its Special Flood Hazard Area (SFHA) where base flood elevations have been determined. Communities should have received letters from ISO regarding this new prerequisite. See [Frequently Asked Questions on Class 8 Freeboard](#).

### New Credit Opportunities

**Activity 370 (Flood Insurance Promotion)** will be modified to offer additional credit for the flood insurance coverage improvement plans (element CP) and implementation (element CPI), and technical

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assistance (element TA). New elements will be added to provide credit for enhanced flood insurance promotion efforts. These new elements will be much like bonus credit for CP and CPI.

Under **Activity 510 (Floodplain Management Planning)**, a new sub-element will be created for the development of floodplain species assessments under natural functions plan (element NFP). Credit for the development of Level 1 and Level 2 floodplain species assessments is aimed at encouraging communities to develop a better understanding of the endangered species within their entire community, and of appropriate community measures (including CRS-credited items) that protect endangered species.

**Activity 510 (Floodplain Management Planning)** will also have a new element for the development of a community substantial damage properties management plan (element SDPMP). Such a plan identifies steps that a community can take well before a flood to efficiently and effectively meet the NFIP requirement for assessing flood damage and making substantial damage determinations.

Under **Activity 610 (Flood Warning and Response)**, credit will be provided for flood response operations (element FRO) when plans include damage assessment tasks, floodplain management teams, and/or substantial damage assessment procedures to meet NFIP requirements, as well as local ordinance requirements for substantial damage, including cumulative substantial damage.

### Modifications and Updates

- Paragraph 116.a. of Section 116, Other Program Priorities, in the Coordinator's Manual will be renamed "Natural Floodplain Functions and Endangered Species" to place more attention on CRS activities that protect threatened and endangered species. Although new credit for floodplain species assessments will be provided under Activity 510 (Floodplain Management Planning), there are a number of activities that support endangered species and habitat protection. They will be highlighted in Section 116.a.
- Section 301 and Activity 310 (Elevation Certificates) will be modified to reflect the changes made in the Class 9 prerequisite for Elevation Certificates and the new ECMP credit. Elements ECPO and ECPR will not be changed.
- Section 404, Sea Level Rise Projections and the CRS, will be updated to reflect changes in available sea level rise projections.
- The impact adjustment in Activity 450 (Stormwater Management) for stormwater management regulations (element SMR) and watershed management (WMP) credit will be simplified. Rather than calculate an impact adjustment based on watersheds outside the community, only regulated watersheds within the community will be included. Other clarifications for watershed master planning credit will also be made.

More information on the 2021 Addendum's new credit opportunities, simplifications, and modifications/updates will be presented in upcoming issues of this newsletter. There will also be webinars about the Addendum. ≡ ≡ ≡





## NFIP/CRS Corner (cont...)



# The 4-1-1 on 310

**EDITOR'S NOTE:** *This column explores issues related to a community's successful implementation of CRS Activity 310 (Elevation Certificates).*

## Permit Lists, Again

Each CRS community has a slightly different approach to tracking its building permits, depending on its own management and inspection needs. Because of this, it can be a challenge to pull the information, in the format needed, as documentation for credit under Activity 310 (Elevation Certificates). On their side, ISO/CRS Specialists can struggle to follow along with a community's Permit List if it is vague or incomplete. And CRS Resource Specialists need to be able to readily match up Elevation Certificates to the properties on the Permit List so they can be sure they are reviewing the right thing. Here is a recap of what is needed.

## At Cycle Time

### *What's required for Activity 310 credit?*

- At least 2 months before your cycle visit, your ISO/CRS Specialist asks for your Permit List. On it you should include development dating back to the date of your previous cycle visit.
- Be ready to submit the Elevation Certificates that go with the development shown on the list.
  - Communities that have fewer than 70 Elevation Certificates during the reporting period will submit all their Elevation Certificates.
  - Communities that have more than 70 Elevation Certificates during the reporting period will be asked to submit 80 Elevation Certificates immediately, so that a random selection of 70 can be made by their ISO/CRS Specialist. This gives 10 Elevation Certificates as backup in case some have to be eliminated during the review.

### *What must be on the Permit List?*

It's alright if your Permit List has more information than what is listed below, but all of these items are the minimum required. An instruction sheet and a template for a Permit List are available at <https://crsresources.org/300-3/> to help you.

- New insurable buildings in the Special Flood Hazard Area (SFHA);
- Substantial improvements to insurable buildings in the SFHA;
- Specific address of each building;
- Type of building (residential, non-residential, accessory, etc.);
- Zone as shown on the Flood Insurance Rate Map at the time of the finished construction Elevation Certificate;

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# NFIP/CRS Corner (cont...)



- Whether it is a “new building” or “substantial improvement;”
- Date of the permit; and
- Whether the permit is final.

## *What happens with the Permit List and Elevation Certificates?*

With the Permit List in hand, we look for entries that do not apply or are problematic, such as

- Non-substantial improvements;
- Buildings outside the 100-year floodplain (i.e., in the X Zone);
- Non-insurable buildings (detached garages, utility sheds, fences, fill, cell phone towers, etc.);
- Duplicate entries; or
- Buildings identified as “residential” on the Permit List, but the Elevation Certificate shows they are an “accessory building.”

Please do your best to identify these potential problems on your Permit List before submitting it.

After the ISO/CRS Specialist verifies that the Elevation Certificates match the addresses on the Permit List, they are sent to one of the CRS Resource Specialists, who perform the review. The CRS Resource Specialist then provides the results of the review to the community.

## Some Common Problems

- Elevation Certificates that are outside the date range for the Permit List.
- Elevation Certificates that show a different address than what’s on the Permit List.
- “Construction drawing” or “buildings under construction” Elevation Certificates. Remember, we can use only “FINISHED CONSTRUCTION” Elevation Certificates.
- Poorly scanned Elevation Certificates (too light, crooked on the page, half-page scans, Elevation Certificates with post-it notes on them so we can’t see the information underneath, pages scanned upside-down, etc.).

## For Annual Recertifications

Everything is the same except you submit your Permit List and Elevation Certificates at the same time. Here, it is even more critical to make sure you have the right development shown on the Permit Lists and the Elevation Certificates match the list.

## A Stitch in Time . . .

We understand creating and submitting Permit Lists and Elevation Certificates can be confusing and does take some effort, especially if you have a large number. The review is needed before you can receive credit, though, so if you take a little time to be sure your submission is complete and accurate, it can be reviewed faster and result in less work for everyone.

Take a look at the Permit List template and Instructions at <https://crsresources.org/300-3/> before your cycle visit. Then contact your ISO/CRS Specialist if you have more questions. ≡ ≡ ≡

*(Taken from the February/March 2019 Edition of the NFIP/CRS Update Newsletter)*



# New Process for Repetitive Loss Data

As many CRS Coordinators, floodplain managers, and other CRS enthusiasts know, FEMA's protocols for repetitive loss data are changing. ISO will no longer distribute NFIP repetitive loss data to CRS communities. All communities must request repetitive loss data (repetitive loss lists) directly from the FEMA Regional Office.

As described in Section 501.b of the Coordinator's Manual, a community currently due for a CRS verification cycle visit will need a current repetitive loss property list, and new communities applying for CRS entry also will need a current list.

Before repetitive loss data can be provided by the FEMA Regional Office, communities must have an Information Sharing and Access Agreement (ISAA) in place with FEMA. The ISAA is a written form that must be fully executed before FEMA may release any NFIP data to the community. A fully executed ISAA is valid for three years, and multiple data requests may be made under the ISAA.

- To begin the process of obtaining repetitive loss data, a community should coordinate with its FEMA Regional individuals (see below) and request a blank ISAA or template.
- The ISAA form requests basic community information, but a community's legal team should be prepared to review the form as well.
- The community's Chief Executive Officer (CEO) will need to fill out the ISAA, and it is then to be returned to the FEMA Regional CRS Coordinator.
- The FEMA Regional Office will route the form to FEMA headquarters for review and approval processing.
- FEMA headquarters will return the form to the Regional Office indicating any revisions necessary or indicating it is approved. If the ISAA is approved, then it is returned to the community's CEO for final signature.
- Once signed by the community official, the CEO will send the final signed copy to the FEMA Regional Coordinator for final routing and processing by FEMA headquarters.
- Once complete, FEMA headquarters will return the FEMA final processed document to the Regional Coordinator. The Regional Coordinator will then provide the document back to the community's CEO.
- Upon receiving the executed ISAA, a community may request repetitive loss data from the FEMA Regional CRS Coordinator.

When requesting repetitive loss data, it is important to know there are two different definitions for repetitive loss used by FEMA—the original definition under the NFIP and the definition created by the Biggert-Waters Flood Insurance Reform Act of 2012 that is used for grants and planning (see next article). The CRS uses the original NFIP definition, and communities should be sure that repetitive loss data are requested using the NFIP definition. To help ensure the correct data are being provided, a community should let its ISO/CRS Specialist know it will be requesting data for CRS purposes. The ISO/CRS Specialist will help by providing a transmittal sheet to submit to FEMA that clarifies which data set is being requested. This important step ensures a community will receive the appropriate repetitive loss list.

To request an ISAA, contact John Bowman, FEMA Region 6 at [JohnE.Bowman@fema.dhs.gov](mailto:JohnE.Bowman@fema.dhs.gov).

*(Taken from the June/July 2020 Issue of the NFIP/CRS Update Newsletter)*



# Corrections to the Repetitive Loss Update Worksheet

To accompany the new process for obtaining repetitive loss data for your community, FEMA also has a new process in place for submitting any corrections you need to make to your community's repetitive loss list using the AW-501.

Historically, CRS communities submitted to ISO corrections to their repetitive loss properties, such as duplicate listings, address corrections, verified mitigation efforts, and incorrect community identification numbers. ISO is no longer processing these corrections, as FEMA has brought this task in house. All corrections are now to be sent directly to FEMA at [NFIPUnderwritingMailbox@fema.dhs.gov](mailto:NFIPUnderwritingMailbox@fema.dhs.gov). Below is guidance as outlined in the Flood Insurance Manual. Documentation required to correct or update a property's prior loss information includes but is not limited to the following:

**Invalid Loss History Association**—Documentation that shows

- Incorrectly linked addresses and/or losses; or
- A second address added to a Property Locator Record.

**Property Value Updates**—The property value is based on market value, which must be shown on one of the following documents:

- Property tax assessment; or
- Property appraisal.

**Mitigation Action**

- Elevation Certificate based on finished construction of the new or improved building;
- Color photographs of the building before the improvement;
- Color photographs of the building after the improvement;
- Photographs of the flood vents/openings (if applicable);
- Source of funding for the mitigation action (state, local, or individual);
- Demolition permit (if the building was demolished and rebuilt);
- Building permit (if the building was elevated or rebuilt); and
- In Zone B, C, or X, a signed statement from a community official that shows mitigation was approved by the community.

Required documents should be mailed to NFIP Bureau and Statistical Agent, Attn: Underwriting, 8400 Corporate Drive, Suite 350, Hyattsville, Maryland 20785, or sent via email to [NFIPUnderwritingMailbox@fema.dhs.gov](mailto:NFIPUnderwritingMailbox@fema.dhs.gov). ≡ ≡ ≡

*(Taken from the June/July 2020 Issue of the NFIP/CRS Update Newsletter)*





# Q and A Time



## Time for a grab bag of a few questions that have short answers.

**Question:** We know the “50% rule” (substantial improvement/substantial damage) applies to manufactured homes, including homes installed on rented lots. The parish assessor’s records only show values for the manufactured home park land, not the homes owned by tenants. How do we figure out the market value of a manufactured home unit on a rented lot?

**Answer:** The local official who asked the question was reluctant to request a professional appraisal, largely because the cost would be a burden to the owner of the home. Homes not permanently affixed to a foundation are personal property, not real property (side bar). I can think of two ways to estimate market value:

1. There’s a market for used manufactured homes, so it stands to reason there’s something online to estimate market values, just like there is for used vehicles. Sure enough, a web search turns up several tools. You can ask the owner to provide a report from one or more of the online tools. Then you review it just as you review appraisal reports to determine that the basic characteristics of the home are correct (age, condition, dimensions, etc.).
2. Ask the assessor. Just because the assessment for land on which the unit in question is located doesn’t show value for the unit doesn’t mean there’s no answer from the assessor’s office. Assessment records typically provide assessed values split out for land and improvements (primary structure, accessory structures, pools, etc.). The records also characterize structures, and probably identify manufactured homes. If your assessor’s records are set up this way, the assessor’s office has experience assessing the value of manufactured homes, although likely only those affixed to permanent foundations. Perhaps the assessor’s office can estimate how much value is attributed to foundations, to estimate the value of just the home.

### Real vs Personal Property

I don’t know if it’s the same in all states, but I understand manufactured homes usually are considered personal property, like vehicles, unless the homes are affixed to permanent foundations. When attached to permanent foundations, homes are taxed as real property.

I learned this years ago when communities were asking how to handle a surge in applications for permanent foundations for manufactured homes – the question was “how high.” Of course, the answer was “at or above the BFE.” The surge was prompted by owners seeking financing and discovering mortgage loans for real property could be financed for 30 years, while personal property loans were much shorter.

**Question:** Should surveyors shoot the lowest electric outlet as the “C2.e) Lowest elevation of machinery or equipment servicing the building” requested on the Elevation Certificate?

**Answer:** No, the surveyor should not shoot the elevation of the lowest outlet or switch because they are electrical devices, not equipment or machinery. Keep in mind ECs are used for two purposes: the NFIP uses the information on ECs to rate buildings for federal flood insurance policies and communities use the information to help determine compliance.

- For insurance purposes, the lowest elevation of (or elevation of the lowest) equipment or machinery is surveyed. See the EC instructions for Item C2.e).

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# Q and A Time (cont...)



- For compliance purposes, while a properly completed EC has lots of information that helps local officials check compliance, it doesn't have everything (e.g., flood damage-resistant materials).

Now, suppose there are electric outlets and switches below the BFE – is that a compliance problem? Maybe. Let's look at FEMA guidance and the International Codes and ASCE 24:

- FEMA guidance indicates it is acceptable to allow the minimum electric service required to address life safety and electrical code requirements for building access and storage areas. One example is a light switch at the bottom of stairs to the elevated building. Guidance recommends below-BFE electric devices should be intended on a ground-fault circuit interrupter (GFCI, a fast-acting circuit breaker) and electrically isolated from the service for the rest of the building. I emphasize minimum for a reason. In my mind, a garage or storage room with lots of outlets doesn't pass the test. See FEMA P-348 *Protecting Building Utility Systems from Flood Damage*, FEMA P499 *Homebuilder's Guide to Coastal Construction*, and Technical Bulletin 1 *Openings in Foundation Walls and Walls of Enclosures*.
- The International Residential Code allows "electrical wiring systems" below the required building elevation if the systems conform to the provisions of the electrical code for wet locations (R322.1.6). Similarly, ASCE 24 (referenced by the International Building Code), states a "minimum number of lighting circuits, switches, receptacles and lighting fixtures" are permitted below "where required to meet life safety provisions of the code" and energized from a panel above and supplied by branch circuits originating from GFCI breakers. See [FEMA Building Science Resources](#) for excerpts of the flood provisions of the I-Codes and "Highlights of ASCE 24."

**Question:** Do we need to require a floodway encroachment analysis when a utility company installs poles in a floodway?

**Answer:** Installation of poles is development under the NFIP's broad definition of the term, which means permits should be issued when companies install poles in special flood hazard areas. The first question is what requirements apply generally, then we'll get to the floodway question.

- As with all floodplain development, the objective is to resist flood damage and not contribute to damage on other properties. For utility poles, I'd hope the company would recognize installation in flood-prone areas likely requires additional consideration of stability under conditions of flooding. Will the ground be saturated and for how long? How does that affect the ability of the pole and anchor wires to hold up the service lines? How likely is debris impact? If debris collects at a pole, does that affect stability? What should a company submit to support a permit application? I'd ask for an explicit statement that anticipated conditions of flooding (depth, velocity, duration and debris) were considered in developing the installation specifications.
- Now, what about installation of poles in a floodway? In theory, any encroachment in a designated floodway should be evaluated to determine whether there is or is not an unacceptable impact on flood levels during the base flood. But it's not practical to use computer models to evaluate the presence of

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# Q and A Time (cont...)



one or two (or more) 2-foot diameter utility poles carrying lines across a waterway. FEMA guidance recognizes this limitation, indicating that “some minor projects are too small to warrant an engineering study and the [no-rise] certification...a sign post or telephone pole will not block flood flows.” See FEMA 480, *NFIP Floodplain Management Requirements: A Study Guide and Desk Reference for Local Officials*. ≡ ≡ ≡

*(Taken from the ASFPM's The Insider, March 2019 Newsletter)*



With Thanksgiving being just around the corner, we would like to say...

*We hope you all have a safe  
and happy Thanksgiving  
Holiday!!*

From: Cindy, Pam, Susan, & Jeanette



**Thanksgiving Wishes**



LOUISIANA DEPARTMENT OF  
TRANSPORTATION & DEVELOPMENT

Our goal is flood loss reduction . . .

If you or someone you know would like to receive future copies of this newsletter please contact our office:

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E-MAIL: [pam.lightfoot@la.gov](mailto:pam.lightfoot@la.gov)  
WEBSITE: <http://floods.dotd.la.gov>

A large, stylized graphic that says "Fall is Here!". The text is in a bold, orange, blocky font with a black outline. It is surrounded by several colorful autumn leaves in shades of orange, yellow, and green.

A graphic that says "HAPPY FALL Y'all". The words "HAPPY FALL" are in a simple, black, sans-serif font. "Y'all" is in a large, yellow, cursive font. Below "Y'all" are two small black acorns and two small orange leaves. The entire graphic is surrounded by four large, colorful autumn leaves in shades of orange, yellow, and green.